

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
No. 5:19-MC-00028**

FORTITUDE FINANCIAL
INVESTMENTS, INC.,

Plaintiff,

v.

LSTAR MANAGEMENT, LLC,

Defendant.

**RECEIVER'S MOTION TO
APPROVE SETTLEMENT AND
RELEASE AGREEMENT**

Margaret R. Westbrook, Esq. ("Receiver"), as Receiver for LStar Management, LLC ("Management"), by and through undersigned counsel, hereby moves the Court for an Order approving the proposed Settlement and Release Agreement between Patrick Sullivan, William Hampton Pitts, and Rachel Vradenburgh (the "Employees"), LStar Development Group, Inc. and Landquest Legacy of North Carolina, LLC and its subsidiary and affiliate companies (collectively "Development"), Kyle V. Corkum ("Corkum"), Management, and Receiver (the Employees, Development, Corkum, Management, and the Receiver may be referred to collectively herein as the "Parties" or individually as a "Party").

The proposed Settlement and Release Agreement is entered into pursuant to the authority vested in Receiver via the Court's prior Order appointing Receiver on March 11, 2020 (ECF No. 9). For the reasons set forth in the accompanying brief in support, Receiver requests that the Court enter an Order approving the proposed Settlement and Release Agreement.

Respectfully submitted, this the 26th day of May, 2022.

K&L GATES LLP

/s/ Margaret R. Westbrook

Margaret R. Westbrook

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of this document to be filed electronically through CM/ECF and, thus, to be served by electronic notification on those parties properly registered for electronic service through this Court's CM/ECF system, including the following:

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Respectfully submitted this 26th day of May, 2022.

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